



January 31, 2014  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE: EB Docket No. 06-36**  
**2013 CPNI Certification Filing for AMI Communications, Inc.**  
**Form 499 Filer ID 813231**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of AMI Communications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@tminc.com](mailto:cwrightman@tminc.com).

Thank you for your assistance in this matter.

Sincerely,

/s/ Connie Wightman  
Consultant

cc: Mary Haberek (via Email)  
file: AMI - FCC  
tms: FCCx1401


Enclosures  
CW/lw

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014:	Covering calendar year 2013
Name of company(s) covered by this certification:	AMI Communications, Inc.
Form 499 Filer ID:	813231
Name of signatory:	Mary Haberek
Title of signatory:	Vice President

1. I, Mary Haberek, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Mary Haberek, Vice President  
AMI Communications, Inc.

Date: 1/31/14

Attachments:      Accompanying Statement explaining CPNI procedures  
                         Explanation of actions taken against data brokers (not applicable, see Statement)  
                         Summary of customer complaints (not applicable, See Statement)

## Attachment A

### Statement of CPNI Procedures and Compliance

Attachment A  
Statement of CPNI Procedures and Compliance  
**AMI Communications, Inc.**

**USE OF CPNI**

AMI Communications, Inc. ("AMI") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. AMI has trained its personnel not to use CPNI for marketing purposes. Should AMI elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

AMI does have CPNI, including call detail information concerning the calls made using the Company's services. However, this information is not made available to customers over the telephone or in person. Online access to account information is protected as described below.

**PROTECTION OF CPNI**

As set forth below, AMI has put into place processes to safeguard its customers' CPNI (including call detail information) from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. AMI responds back in writing, to the authorized customer representative at the primary address of record. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

**DISCLOSURE OF CALL DETAIL OVER PHONE**

AMI does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

**DISCLOSURE OF CPNI ONLINE**

AMI has instituted authentication procedures to safeguard the disclosure of CPNI online. AMI's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. AMI authenticates customers by establishing a password with a security question for online access to the account. All customers are required to establish a password without the use of readily available biographical information or account information if they want to have on-line access to their CPNI. Unless the appropriate password is provided, AMI does not allow on-line access to CPNI.

AMI has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure operates as follows: If there is a change, an email is sent to the authorized representative of record who initially established the password. If the security question cannot be answered correctly, an AMI representative will call back the authorized representative of record at the address of record to reset the password.

AMI has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. If the customer calls AMI due to a problem with the online access, AMI will call back the contact at the address of record to resolve the issue.

#### **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

AMI does not have any retail locations and therefore does not disclose CPNI in-store.

#### **NOTIFICATION TO LAW ENFORCEMENT**

AMI has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

AMI maintains written records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

#### **ACTIONS AGAINST DATA BROKERS**

AMI has not taken any actions against data brokers in the last year.

#### **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

AMI did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2013.

#### **INFORMATION ABOUT PRETEXTERS**

AMI has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. AMI is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions AMI takes against pretexters and data brokers.